

DEC 18 2013

53-0187



December 17, 2013

Mr. John A. Trimmer, Chief
State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control

CERTIFIED MAIL
Return Receipt Requested

Nashville, TN 37243-1531

Re: Wampler's Farm Sausage Company

Dear Mr. Trimmer:

Proton Power submitted on behalf of Wampler's Farm Sausage notification of initial startup on natural gas for the 3 generators (966398P) July 24, 2013 (enclosed).

Proton Power submitted a letter October 1, 2013 (enclosed) to the state requesting an extension of the construction permits for Wampler's and again provided notification of startup on natural gas.


Proton Power received a copy of a letter submitted to Mr. Wampler dated December 12, 2013 notifying him that the permits were no longer valid. In accordance with the instructions in this letter, Proton Power is submitting APC 100, APC 101, forms and a signed certification of start-up date for the generators on natural gas.

Proton Power has continued to operate in good faith on behalf of Wampler's and respectfully requests permission to continue construction activities at the Wampler's facility under the requirements set forth in the original permits until such time that renewed permits can be issued. The rationale for this request is due to the fact that no changes have been made to the original permit application and the conditions of the permit are not anticipated to change.

It has been and continues to be the intent of Proton Power and Wampler's Farm Sausage to operate in accordance with the conditions of the permits and to operate in compliance with all environmental regulations. We have strived to maintain contact with the permitting authorities in Nashville and the local environmental field office.

We appreciate your assistance and look forward to hearing from you.

Sincerely,

A handwritten signature in black ink that reads "Sally Almond, P.E.". The signature is fluid and cursive, with the first name "Sally" being more prominent and the last name "Almond" written in a more compact, connected style. The "P.E." is written in a slightly larger, more formal script at the end of the signature.

Sally Almond, P.E.
Chemical Engineer/EHS Manager
Proton Power, Inc.
865-312-3859

Cc: Martie Carpenter – TDEC Knoxville Field Office
Ted Wampler, Jr. – Wampler's Farm Sausage
East Tennessee Permit Program – Nashville, TN



DEC 18 2013

July 24, 2013

Mr. John A. Trimmer, Chief
State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
9th Floor, L&C Annex
401 Church Street
Nashville, TN 37243-1531

CERTIFIED MAIL
Return Receipt Requested
7011 1570 0000 4274 7686

Re: Air Construction Permit 966398P – Generators
Wampler's Farm Sausage Company

Dear Mr. Trimmer:

On behalf of Wampler's Farm Sausage, Proton Power is providing notification of initial startup of the 3 generators. At this time the generators are operating on natural gas only. A catalytic oxidizer is not being utilized while natural gas is being supplied. Proton Power has portable and stationary emissions testing equipment which indicate compliance with the emissions limits set forth in the permit referenced above. We anticipate that the system will be producing CHyP gas to power the generators by September, however we will provide notification when that occurs.

Should you have any questions, or need additional information, please do not hesitate to contact me at 865-312-3859.

Sincerely,

Sally Almond, P.E.
Chemical Engineer/EHS Manager

Cc: Martie Carpenter – TDEC Knoxville Field Office
Ted Wampler, Jr. – Wampler's Farm Sausage



October 1, 2013

Mr. John A. Trimmer, Chief
State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa Parks Ave
Nashville, TN 37243

CERTIFIED MAIL
Return Receipt Requested
7011 1570 0000 4274 7754

Re: Air Construction Permits 966458P, 966398P
Wampler's Farm Sausage

Dear Mr. Trimmer:

On behalf of Wampler's Farm Sausage, Proton power provided notification of initial startup of the generators on natural gas on July 24, 2013.

Proton Power is currently in the process of testing and tuning the engines on CHyP gas. Concurrent with this process we are testing the feed system and the biochar handling system. The construction permits referenced above are due to expired soon. We respectfully request that the construction permits be extended to allow us to complete the commissioning process for this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally Almond", with a stylized flourish at the end.

Sally Almond, P.E.
Chemical Engineer/EHS Manager



DEC 18 2013

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
WILLIAM R. SNODGRASS TENNESSEE TOWER
312 ROSA L. PARKS AVENUE, 15TH FLOOR
NASHVILLE, TN 37243

CERTIFIED MAIL 7007 0710 0004 1329 2070
RETURN RECEIPT REQUESTED

December 12, 2013

Mr. Ted Wampler, Jr.
Wampler's Farm Sausage Company
781 Hwy 70 W
Lenoir City, TN 37771

Re: 53-0187-01/66398 and 53-0187-02/66458, Start-up Certifications and Operating Permit Applications for
Wampler's Farm Sausage Company at 781 Hwy 70 W, Lenoir City

Dear Mr. Wampler:

The Division received a letter dated October 1, 2013, from Proton Power requesting on behalf of Wampler's Farm Sausage Company that the expiration date on construction permits, 966398P and 966458P, be extended. Both of the construction permits expired on October 1, 2013. We must deny your request for an extension of the expiration date of non-valid permits. Please be advised that a responsible official of your company must request any permitting action.

The letter also referred to correspondence dated July 24, 2013, which indicated that Proton Power on behalf of Wampler's Farm Sausage Company submitted a start-up certification for source 53-0187-01, construction permit 966398P. It appears that the start-up certification was not signed by the permittee. Condition 13 of construction permit 966398P clearly states, "the permittee shall certify the start-up date..."

Please provide the Division with the following information:

1. Construction Permit 966398P, Source 53-0187-01

a. Please submit a start-up certification signed by the permittee.

b. Per start-up certification dated July 24, 2013, the source is operating. Therefore, extending the date on a construction permit is not required. Testing and tuning the engines on ChyP gas can be done with a valid operating permit. Please submit an APC-100 application form, requesting an operating permit signed by a responsible person of your facility.

2. Construction Permit 966458P, Source 53-0187-02

- a. The Division has no record of receiving a start-up certification or operating permit application for this source. If the source has not started operating, then you must apply for a new construction permit by submitting APC 100, APC 101, and APC 102 application forms. Please include the appropriate construction permit application fee.

If the source has begun operating, please provide the Division with a start-up certification. If 30 days has passed since the source began operating, then please submit an operating permit application, APC 100, signed by a responsible person of your facility.

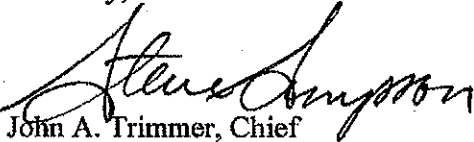
The generator requirements pursuant to 40 CFR part 60 subpart JJJJ must still be met by your facility.

Please be advised that the Division may elect to take enforcement action for the non-compliance of your construction permits. This letter is only addressing the procedures to obtain valid permits for your facility.

If you have questions, please contact Olga Jacobsen at (615) 532-0581 or via email at Olga.Jacobsen@tn.gov.

A COPY OF THIS LETTER MUST BE SUBMITTED WITH THE REQUESTED INFORMATION.

Sincerely,



John A. Trimmer, Chief
East Tennessee Permit Program

JAT/ODJ

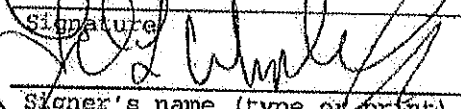
22. The permittee shall certify the start-up date of the air contaminant source regulated by this permit by submitting ~~A COPY OF ALL STAGES OF THIS PERMIT~~ with the information required in A) and B) of this condition completed, to the Technical Secretary's representatives listed below:

A) DATE OF START-UP: 7 / 24 / 13
month day year

B) Anticipated operating rate: 95 percent of maximum rated capacity

For the purpose of complying with this condition, "start-up" of the air contaminant source shall be the date of the setting in operation of the source for the production of product for sale or use as raw materials or steam or heat production.

The undersigned represents that he/she has the full authority to represent and bind the permittee in environmental permitting affairs. The undersigned further represents that the above provided information is true to the best of his/her knowledge and belief.

Signature 		Date <u>12-17-13</u>
Signer's name (type or print) <u>Ted Wampler</u>	Title <u>Pres. & COO</u>	Phone (with area code) <u>865-986-2056</u>

Note: This certification is not an application for an operating permit. At a minimum, the appropriate application form(s) must be submitted requesting an operating permit. The application must be submitted in accordance with the requirements of this permit.

The completed certification shall be delivered to East Tennessee Permit Program and the Environmental Field Office at the addresses listed below no later than 30 days after the air contaminant source is started-up.

East Tennessee Permit Program
Division of Air Pollution Control
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531

Knoxville Environmental Field Office
Division of Air Pollution Control
3711 Middlebrook Pike
Knoxville, TN 37921

End of Conditions

